

RESPONSE TO 4/5/85 CIL

EPA Region 5 Records Ctr.



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May 22, 1985

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Mark A. Haney, Manager  
Facilities Compliance Unit  
Compliance Monitoring Section  
Illinois Environmental Protection Agency  
Division of Land Pollution Control  
2200 Churchill Road  
Springfield, IL 62706

Re: 2010300032 -- Winnebago County  
Rockford/Rexnord - Rockford Products Plant 2  
ILD000805895

Dear Mr. Haney:

This letter is in response to your letter of May 9, 1985 to Rockford Products concerning a RCRA TSD storage area inspection that was conducted at our Plant 2 on April 24, 1985. Two pages of deficiencies were set forth as Attachment A to your letter.

As we discussed by telephone, as of May 21, 1985 the storage area at Plant 2 has been emptied of hazardous waste drums and in the future will be operated as a generator accumulation area pursuant to the requirements of 35 IAC 722.134. Further, we hereby invite Inspector Patricia M. Luedtke to reinspect the storage/accumulation area at her earliest convenience on any day after May 27. We would appreciate it if she would make an appointment with Larry Hammond in advance for that inspection.

Regarding the deficiencies set forth in Attachment A;

Page 1, Paragraph 1: 35 IAC 725.115 relates to TSD facilities. As we will no longer be operating a storage area, this deficiency will not be relevant to our accumulation area.

Page 1, Paragraph 2: The waste contained in the collection box is a sludge, but does not contain cyanide. At the time the box was inspected, it was empty and had not yet been properly located prior to receiving a first load of sludge. The box will always be properly positioned while it is being loaded with waste sludge.

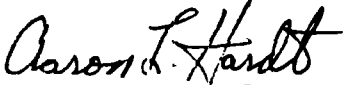
May 22, 1985  
Page No. 2

- Page 1, Paragraph 3: The spill control and decontamination equipment will be tested daily and the test results recorded in a Test Log.
- Page 1, Paragraph 4: A proper contingency plan will be completed by May 27, 1985.
- Page 2, Paragraph 1: Documentation of the authority of the emergency coordinator and designated alternates to commit the resources needed to carry out the contingency plan has been completed.
- Page 2, Paragraph 2: 35 IAC 725.212 relates to TSD facilities. As we will no longer be operating a storage area, this deficiency will not be relevant to our accumulation area.
- Page 2, Paragraph 3: The one container of hazardous waste in poor condition has been properly disposed of and was shipped in an 85-gallon U.S. DOT shipping container.

For your records, please note that Richard N. Johnson is now the Vice President of Manufacturing at Rockford Products. We trust that we have satisfactorily responded to your letter of May 9 and that this matter will be closed promptly after Patricia Luedtke reinspects our accumulation area sometime after May 27, 1985.

Very truly yours,

Rexnord Inc.  
Rockford Products Corp.

  
Aaron L. Hardt  
Environmental Counsel  
Legal Department  
(414)797-5687

/lml

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